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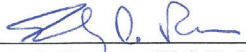
August 12, 2021

**Via ECF**

Hon. Edgardo Ramos  
U.S. District Court for the Southern District of New York  
40 Foley Square, Courtroom 619  
New York, NY 10007

**Steptoe**  
**MEMO ENDORSED**

Plaintiff's application to file two exhibits under seal is GRANTED. The parties are further directed to appear for a discovery conference on August 19, 2021 at 9am. The parties are directed to dial (877) 411-9748 and enter access code 3029857# when prompted.

  
Edgardo Ramos, U.S.D.J.  
Dated: 8/13/2021  
New York, New York

**Re: *Deborah Deffaa v. Pivotal America Inc. and Pivotal Group Pty Ltd*, 20 Civ. 5466—  
Letter Motion to Seal**

Dear Judge Ramos:

We represent plaintiff Deborah Deffaa and write to respectfully request the Court's permission to file under seal two exhibits to a letter that will be filed contemporaneously with this request. Specifically, we will be filing a letter as the Court directed (*see* ECF 59) to respond to the letter from the plaintiffs (collectively, "Pivotal"), dated August 6, 2021, seeking a protective order that would allow it to maintain over 2,000 documents as "Attorneys' Eyes Only," or "AEO." (ECF 58.) The two exhibits are examples of documents we believe were improperly marked AEO. The Court had previously permitted us to file 20 other examples, in connection with earlier correspondence on this same issue. (ECF 57.)

Our letter application does not seek to strip the two documents of all confidentiality; rather, our objective is to allow our client, Ms. Deffaa, to view the materials so she can meaningfully participate in the case. Even if the material is downgraded to "Confidential," thus allowing Ms. Deffaa to view it, the umbrella protective order still provides protection against public filing. (ECF 31 ¶ 8.) Accordingly, we respectfully request the Court's permission to file the two exhibits to our forthcoming letter under seal.

\* \* \*

We thank the Court for its attention to these matters.

Respectfully,

/s/ Charles Michael

Charles Michael

cc: Edward Grosz (counsel for Pivotal, via ECF)